

# EXHIBIT “A”

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

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EBONY S. JERIDO

Plaintiff(s),

-against-

SHREE K. SYANGTAN AND VENTURE LEASING LLC

Defendant(s).

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**VERIFIED BILL  
OF PARTICULARS**

Index No.  
24667/2018

Plaintiff, by her attorneys, Trolman Glaser Corley & Lichtman, P.C., responding to defendants' demand for a Bill of Particulars, alleges, upon information and belief, as follows:

1. The plaintiff's name is as it appears in this caption. Plaintiff resides at 750 Grand Concourse, Apt 3H, Bronx, NY 10451.

2. The plaintiff's date of birth is [REDACTED]

3. The plaintiff's social security number is xxx-xx-[REDACTED]

4. The occurrence took place on or about January 02, 2018 at approximately 6:05PM.

5. The occurrence took place at or around 160 East 156th Street, in the County of Bronx, City and State of New York.

6. The defendants were negligent, careless and reckless as follows: in operating and controlling the motor vehicle owned by the defendant in a reckless and careless manner; in failing to keep the said motor vehicle under proper control; in failing to operate said motor vehicle at a proper rate of speed under the existing road and pedestrian condition; in causing, allowing and permitting the said

motor vehicle to come into contact with the plaintiff, a pedestrian; in failing to yield the right of way to the plaintiff, in failing to keep a due, proper and sufficient lookout; in being otherwise negligent; in failing to properly utilize the horn or other signal or warning devices; in failing to give any signal or warning of the defendant's movement of the vehicle; in causing, allowing and permitting the plaintiff to get caught in the vehicle's door; in driving with plaintiff stuck in the door, in dragging plaintiff and propelling her into the car and ground; in failing to stop, in failing to look; in failing to utilize mirrors, in failing to monitor plaintiff's exit from vehicle; in accelerating the vehicle in an unsafe manner, in failing to warn plaintiff; in failing to inspect that the door was closed before accelerating, in failing to monitor warning lights and signals on the dashboard, in failing to make due, proper and diligent application of the brakes and/or braking equipment.

7. The plaintiff, a pedestrian, was struck by the defendant's negligently operated motor vehicle and door, and was struck, caught, propelled and dragged.

8. The defendants violated those statutes, ordinances, codes, rules and regulations of the State of New York, in such cases made and provided, and of which this Court may take judicial notice including, but not limited to, the Vehicle and Traffic Law and the Rules of the City of New York.

9. The particulars concerning the defendant's motor vehicle have

been set forth in the plaintiff's Verified Complaint.

10. The plaintiff has sustained the following personal injuries, all of which, upon information and belief, are of a lasting and permanent nature, and none of which are an exacerbation or aggravation of a pre-existing injury or condition:

**HEAD**

TRAUMATIC BRAIN INJURY

CONCUSSION

POST-CONCUSSION SYNDROME

HEADACHES

DIZZINESS

NAUSEAU

NUMBNESS

VOMITING

BALANCE IMPAIRMENT

HEARING AND VISION IMPAIRMENT

MEMORY IMPAIRMENT

SLEEP DISTURBANCE

COGNITIVE DEFICITS

CONFUSION AND PROCESSING IMPAIRMENT

TRAUMATIC CEPHALGIA

TRAUMATIC VERTIGO

ANXIETY

**FACE**

LEFT NASAL BONE FRACTURE

LACERATIONS, SUTURING AND SCARRING OF UPPER LIP

LACERATIONS, SUTURING AND SCARRING OF INSIDE OF CHEEK

FACIAL NUMBNESS

FACIAL SENSITIVITY

**NECK**

HERNIATED DISC WITH CORD COMPRESSION AT C3/4, C4/5, C5/6, C6/7

DICS BULGE/HERNITATION AT C2/3

CERVICAL SPRAIN

DECREASED RANGE OF MOTION AND USE

AGGRAVATION/EXACERBATION OF PRIOR INJURY/CONDITION OF NECK

**BACK**

HERNIATED DISC AT L4/5

BULGING/HERNIATED DISC AT L2/3, L3/4 AND L5/S1

LUMBOSACRAL SPRAIN

MYALGIA,

MYOSITIS

RESTRICTION OF MOTION AND USE

AGGRAVATION/EXACERBATION OF PRIOR INJURY/CONDITION OF BACK

**LEFT KNEE**

AGGRAVATION/EXACERBATION OF PRIOR MENISCAL/TISSUE INJURY OF

LEFT KNEE; PAIN, BUCKLING, DECREASED MOTION AND WEIGHT

BEARING ABILITY.

The plaintiff has suffered and will continue to suffer from severe pain in and about the area of her neck and back, face and head, with accompanying tenderness, resultant restriction and limitation of movement and motion, attempts at movement and motion being performed slowly, guardedly and with increased pain, there being weakness and loss of strength in the neck and back, with injury to attendant muscles, ligaments and tendons, with a substantial loss of functional use.

The plaintiff has suffered and will continue mental anguish as a result of the aforementioned injuries, accompanied by nervousness, anxiety, discomfort, loss of sleep due to pain and inability to attend daily living activities, and loss of ability to engage in societal and recreational activities.

11. The plaintiff was treated and released at Harlem Hospital on January 2, 2018.

12. The plaintiff has been confined to her home and/or bed, for the most part, except for necessary hospital and medical treatment, for approximately four (4) months.

13. The plaintiff was incapacitated from employment from the date of the occurrence to January 3, 2019. The approximate amount of loss of earnings is \$50,000.

14. The following special damages have been incurred to date:
- a) Physicians services: to be provided.
  - b) Medical supplies: to be provided.
  - c) Nurses services: to be provided if applicable.
  - d) Hospital expenses: to be provided.
  - e) X-ray expenses: to be provided.
  - f) Chiropractors: to be provided if applicable.
  - g) Physiotherapists: to be provided if applicable.
  - h) Drug and medications: to be provided if applicable.
  - i) Lost earnings: to be provided.

j) Other: to be provided if applicable.

15. Improper demand for a bill of particulars.

16. Not applicable.

17. At the time of the occurrence plaintiff was employed as a Job Opportunity Specialist by the Human Resources Administration located at 150 Greenwich Street, New York, NY 10007.

18. Not applicable

19. The plaintiff received no-fault reimbursement from the American Transit Insurance Company under claim no. TNC18000598-0301.

20. The plaintiff has sustained a serious injury and/or economic loss greater than basic economic loss as defined in §5102, etc., of the Insurance Law of the State of New York in that he has sustained personal injuries which has resulted in a fracture; and/or permanent loss of use of a body organ, a member function or system; and/or permanent consequential limitation of use of a body or member; and/or significant limitation of use of a body function or system; and/or permanent pain and/or a medically determined injury which prevented him from performing substantially all of the material acts which constitute his usual and customary daily activities for a period in excess of 90 days during the first 180 days immediately following the accident.

21. Not applicable

22. Not applicable

23 - 25. Not applicable.

Dated: New York, New York  
May 26, 2020

*Jeffrey A. Lichtman*

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